

Meyerhoff, Richard

From: Stacey Sullivan <SSullivan@suscon.org>
Sent: Friday, July 22, 2016 2:26 PM
To: Meyerhoff, Richard; dorzalli@cvsalinity.org
Subject: RE: CV-SALTS: Policy documents - request for comments
Attachments: Draft Drought Policy_060316+Sustainable Conservation comments (2).docx; Draft Offsets Policy_060316+Sustainable Conservation comments.docx

Dear Mr. Meyerhoff and Ms. Orzalli:

Sustainable Conservation appreciates the opportunity to comment on the draft CV-SALTS policy documents. As requested, we have made specific comments and suggestions for new language in the documents themselves using Track Changes. We have restricted our comments to the documents most relevant to our work - the Draft Offsets Policy and the Draft Drought Policy. Our main issues can be summarized as follows:

Groundwater recharge for dilution as a beneficial use: Using surface water for groundwater recharge (GWR) is currently considered to be a beneficial use of surface water when its purpose is future extraction, halting saltwater intrusion, or *maintaining water quality* (emphasis added). We are requesting clarification as to whether using groundwater recharge to dilute salinity or nitrate concentrations in the receiving water can constitute maintenance of water quality for purposes of determining beneficial use. If this activity can be considered a beneficial use, we request that the Sacramento-San Joaquin River Basin Plan be amended to include GWR as a recognized beneficial use consistent with the current designation in the Tulare Basin Plan.

Will offsets be an available option for addressing nitrate contamination? The Draft Offsets Policy appears to be intended to be applicable to both salinity and nitrates. However, at the June 22 workshop a member of the CV-SALTS team stated, in response to concerns raised by environmental justice advocates, that offsets made more sense for addressing salinity, and that they were generally not a good idea for nitrate contamination. We are requesting clarification of this matter.

Offsets cannot disproportionately impact disadvantaged communities. If offsets are adopted as an alternative means to address the impacts of discharges, explicit language needs to be included that ensures that offsets will not be granted if they could lead to disproportionate impacts on disadvantaged communities. These communities should not suffer localized negative impacts as a result of offsets, even if the offsets would lead to a net increase in environmental benefit on a basin-wide level.

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